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MAR 24 2006

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re the Application of

Applicant: Sanjeev Aggarwal, et al. Docket Number: TI-34784.1

Serial No.: **10/679,144** Art Unit: 2812

Filed: 10/03/03 Examiner: Ha T. Nguyen

For: Method of Making a Haze Free PZT Film

CERTIFICATION OF FACSIMILE TRANSMISSION

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<input type="checkbox"/> CONTINUATION APPN	
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NAME OF INVENTOR(S):	
Sanjeev Aggarwal, et al.	
TITLE OF INVENTION: Method of Making a Haze Free PZT Film	
TI FILE NO.:	DEPOSIT ACCT. NO.:
TI-34784.1	20-0688
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MAR 24 2006

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re the Application of: Aggarwal et al.

Docket No.: TI-34784.1

Serial No.: 10/679,144

Art Unit: 2812

Filed: 10/03/2003

Examiner: Nguyen, Ha T.

Confirmation No.:3634

Title: Method of Making a Haze Free PZT Film

REPLY BRIEF UNDER 37 CFR §41.41

March 24, 2006

Board of Patent Appeals and Interferences
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, Virginia 22313-1450

Dear Sir:

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Karen Vertz

3-24-06
Date

Pursuant to the Examiner's Answer mailed 02/28/2006, the Appellants submit this
Appellants' Brief. The Commissioner is hereby requested and authorized to charge any
fees necessary for the filing of the enclosed papers to the deposit account of Texas
Instruments Incorporated, Account No. 20-0668.

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STATUS OF CLAIMS

**Claims 74-76 and 80-97 are the subject of this appeal. Claims 74-76 and 80-97
are pending and rejected**

GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

1. Claims 74-76, 80-85, 87-91, 93-95, and 97 stand rejected under 35 U.S.C. §102(e) as anticipated by the patent granted to Basceri et al. (U.S. Pat. No. 6,444,478).
2. Claims 74-75, 80-82, 84-85, 87-91 and 93 stand rejected under 35 U.S.C. §102(e) as anticipated by the patent granted to Gilbert et al. (U.S. Pat. No. 6,730,354).
3. Claims 86, 92, and 96 stand rejected under 35 U.S.C. §103(a) as unpatentable over the patent granted to Basceri et al. (U.S. Pat. No. 6,444,478).
4. Claim 83 stands rejected under 35 U.S.C. §103(a) as unpatentable over the patent granted to Gilbert et al. (U.S. Pat. No. 6,730,354).
5. Claims 86 and 92 stand rejected under 35 U.S.C. §103(a) as unpatentable over the patent granted to Gilbert et al. (U.S. Pat. No. 6,730,354) in view of Sakurai (U.S. Pat. No. 6,350,644).
6. Claims 76 and 95-97 stand rejected under 35 U.S.C. §103(a) as unpatentable over the patent granted to Sakurai (U.S. Pat. No. 6,350,644) in view of Isobe et al. (U.S. Pat. No. 6,114,199).

7. Claim 94 stands rejected under 35 U.S.C. §103(a) as unpatentable over the patents granted to Sakurai (U.S. Pat. No. 6,350,644) and Isobe et al. (U.S. Pat. No. 6,114,199) in view of Gilbert et al. (U.S. Pat. No. 6,730,354).

ARGUMENT

The Appellants respectfully submit that almost all of the issues raised in the Response to Arguments section (pages 13-24) of the Examiner's Answer are already addressed in the Appeal Brief filed December 14, 2005, and therefore the Appellants' position on those issues won't be repeated here. However, the Appellants wish to address incorrect assertions appearing in the Examiner's Answer that were not presented previously. Specifically, the Appellants respectfully traverse the assertion (on page 13 lines 17-21) that the presence of a heated wafer during a deposition step indicates the use of a preheat step. The Appellants submit that the wafer is usually heated during a deposition process in semiconductor manufacturing and that the heating of a wafer during the deposition process is definitely not an indication that a preheat step was performed. (The Appellants note that the preheat process adds time and expense to the manufacturing process and such processes are only undertaken through a deliberate intention to incur those penalties. Therefore, if a preheat step was intended in Basceri et al. – as asserted in the Examiner's Answer – than a pre-heat step it would have been clearly called for in the teachings of Basceri et al.) Furthermore, the Appellants respectfully traverse the assertion (on page 21 lines 10-15) that a prior manufacturing step of forming the bottom electrode of a capacitor constitutes a preheating step. The Appellants submit that the formation of the bottom electrode of a capacitor is a different process (performed in a different machine) and is a very different step than a preheat step (see page 4 lines 6-7 and 14-18, elements 206 and 208 of the Appellants' Specification; also column 7 lines 39-46 of Sakurai).

CONCLUSION

For the reasons stated above, the Appellants respectfully contend that each claim is patentable. Therefore, the reversal of all rejections is courteously solicited.

Respectfully submitted,



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